

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

In re:

Thomas G. Dolan.

Debtor.

Chapter 7

Case No. 19-12386-FJB

**APPLICATION BY CHAPTER 7 TRUSTEE FOR AUTHORITY TO EMPLOY
VERDOLINO & LOWEY, PC. AS HIS ACCOUNTANTS**

Joseph G. Butler, the Chapter 7 Trustee (the "Trustee") of the estate of Thomas G. . (the "Debtor") hereby moves the court for authority to employ the accounting firm of Verdolino & Lowey, PC. ("Verdolino & Lowey") as his accountants. In support of his application the Trustee states the following:

1. On July 15, 2019, (the "Petition Date") the Debtor filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code (11 U.S.C. §§1101, et. seq.) (the "Bankruptcy Code").
2. On July 15, 2019, the Trustee was appointed as the chapter 7 trustee
3. The Trustee desires to employ the accounting firm of Verdolino & Lowey as his accountant in this case for the purpose of providing:
 - a. Assistance in reviewing, reconciling, analyzing and, if necessary, objecting to proofs of claim.
 - b. Assistance in valuation and insolvency analyses and if necessary expert report preparation and testimony.
 - c. Assistance in identifying and collection of accounts receivable
 - d. Assistance with other litigation matters, if any.
 - e. Preparation of federal and state income tax returns.
 - f. Other matters as directed
4. Verdolino & Lowey, P.C. are knowledgeable and experienced in matters of this type.
5. To the best of the Trustee's knowledge the firm of Verdolino & Lowey has or represents no interest adverse to the estate in this case. To the best of the Trustee's knowledge, any and all

connections of Verdolino & Lowey to the Debtor or any other party in interest are disclosed in the signed statement of Craig R. Jalbert annexed hereto and marked as Exhibit "A".

6. The Trustee believes that it would be in the best interest of the estate and its creditors to employ the firm of Verdolino & Lowey as his accountants because of their experience in matters of this type.

7. Verdolino & Lowey intends to apply to the Court for the allowance of compensation and reimbursement of expenses pursuant to and in accordance with the applicable provisions of the Code, the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court for the District of Massachusetts. The Trustee understands that Verdolino & Lowey intends to bill the Trustee at its customary hourly rates and seek reimbursement of its expenses as charged to non-bankruptcy clients for similar services.

WHEREFORE, the Trustee requests that the Court enter an order authorizing the employment of Verdolino & Lowey as his accountant pursuant to 11 U.S.C. §327(a).

DATED: September 25, 2020

Joseph G. Butler, Chapter 7 Trustee
of the Estate of Thomas G. Dolan
By his attorneys

/s/Joseph G. Butler

Joseph G. Butler, BBO #544284
Law Office of Joseph G. Butler
355 Providence Highway
Westwood, MA 02090
(781) 636 3638
JGB@JGButlerlaw.com